

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN W. SAMPSON, TRUSTEE,

Plaintiff,

- against -

JAMES D. ROBINSON III, LEWIS B.
CAMPBELL, JAMES M. CORNELIUS,
LAURIE H. GLIMCHER, M.D., VICKI L.
SATO, PH.D., LEIF JOHANSSON, LOUIS
J. FREEH, MICHAEL GROBSTEIN, and R.
SANDERS WILLIAMS, M.D.,

Defendants,

and

BRISTOL-MYERS SQUIBB COMPANY,

Nominal Defendant.

Civil Action No. 1:07-CV-06890-PAC

Related Case No: 1:07-cv-05867-PAC

**NOTICE OF MOTION OF PLAINTIFF STEVEN W. SAMPSON, TRUSTEE
FOR AN ORDER APPOINTING LEAD DERIVATIVE COUNSEL**

NOTICE IS HEREBY GIVEN THAT, Plaintiff Steven W. Sampson, Trustee will move this Court on _____, 2007 in Courtroom _____ at _____ for an Order appointing Wolf Haldenstein Adler Freeman & Herz LLP as Lead Derivative Counsel in the above-captioned action.

This Motion is supported by the accompanying Memorandum of Law, the accompanying Declaration of Gregory Mark Nespole and the exhibits annexed thereto, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: August 27, 2007

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: /s/ Gregory Mark Nespole
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